



U. S. Steel
Clairton Works
400 State Street
Clairton, PA 15025-1856

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**Enforcement Programs Section
EPA Region III**

June 30, 1995

Mr. Michael Ioff
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Subject: Coke Oven Collector Mains

Dear Mr. Ioff:

The Clairton Works B Battery collector main design has resulted in a susceptibility to corrosion. Because of increasing numbers of collector main leaks caused by this corrosion, we began an intensive rehabilitation program during March 1995. Repair work has consisted of welding steel plate over the corroded areas of the main. Work has progressed slowly since March because of the difficult nature of the work area. During the repair period, we have performed regular collector main inspections as required by 40 CFR §63.308(a), and both temporary and final repairs were initiated as required. Final repairs, up to this point, have also been completed within the required time.

However, the efforts to comply with the fifteen-day repair requirement for individual leaks have resulted in a disruption to the optimum flow of work on the overall main rehabilitation. That is, by "chasing leaks" up and down the main, we are not making the best use of the repair crew. The repair effort would be most effective when progressing down the main from one end to the other. Consequently, Clairton Works requests that you approve an alternative schedule for the completion of the B Battery collector main repairs.


The work, which has been ongoing, is not expected to be completed until early in the Fourth Quarter of 1995. As described in §63.308(d), we request that the final repair completion time requirement for the B Battery collector main rehabilitation be extended until November 30, 1995. During the interim, we will continue to make the required daily inspections. Temporary repairs will be initiated as required, to the extent that they do not interfere with the permanent repair work. Final repairs are, in effect, initiated now, but will be completed by November 30, 1995.



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We will appreciate your prompt attention to this request. Call me at (412) 233-1101 if you have any questions on this request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. R. McCollum", written in dark ink.

H. R. McCollum
Manager, Environmental Control

HRM/kb-95178

cc: R. Westman (Allegheny County)